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Attorneys for Plaintiffs

7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF ARIZONA**

9 Kashane Kirk, as Personal Representative
 10 and on behalf of the Estate of Leontae
 Kirk; Sharon Roberts, individually;
 11 Brittnie Turner, on behalf of and as legal
 guardian and parent of her minor child,
 MC,

12 Plaintiffs,
 13 vs.

14 City of Phoenix, a governmental entity;
 15 Michael Sullivan, Chief of the Phoenix
 Police Department; Autumn Ladines and
 John Doe Ladines, husband and wife;
 16 Officer Antonio Garza and Jane Doe
 Garza, husband and wife; Sergeant Eric
 Roy and Jane Doe Roy, husband and wife;
 17 Jaclyn Ravelo and John Doe Ravelo,
 husband and wife; Steven Ramirez and
 Jane Doe Ramirez, husband and wife, and;
 18 Jonathan Howard and Jane Doe Howard,
 husband and wife,

19 Defendants.

20 No.: CV-23-00836-PHX-MTL (CDB)

21 **STIPULATION TO EXTEND
 DEADLINES**
(FOURTH REQUEST)

22 (Assigned to the Honorable Michael T.
 Liburdi and referred to the Honorable
 Camille D. Bibles)

23
 24 Through counsel undersigned, the parties hereby stipulate and agree to an extension
 25 of existing deadlines in this action by approximately sixty days each. This Stipulation is
 26 being brought in good faith. Recently, on May 12, 2025 a new statutory beneficiary of
 27 Leontae Kirk was discovered when a paternity test was presented to Plaintiffs. Counsel for

1 both sides had been entertaining settlement discussions and had a mediation scheduled for
2 June 10, 2025. Counsel had discussions regarding extensions of deadlines due to the
3 discovery of the new statutory beneficiary and agreed to extend expert deadlines because
4 of this and the pending mediation. Counsel for Plaintiffs did submit expert reports as of the
5 deadline of May 16, 2025, but because of the discovery of the new statutory beneficiary,
6 the expert reports likely need to be modified. Moreover, the court has also yet to rule on
7 the pending renewed motion to dismiss, which may also still impact discovery in addition
8 to the new beneficiary, and all counsel and some clients have prebooked summer travel
9 that will cause completion of discovery to take a little longer.

10
11 Therefore, the parties stipulate to extend the deadlines as follows:

12
13 1. The last day for Plaintiffs to provide full and complete expert disclosure,
14 from May 16, 2025 to **July 16, 2025**;

15
16 2. The last day to serve final supplemental disclosure, from May 19, 2025 to
17 **July 18, 2025**;

18
19 3. The last day for the parties to meet in person and engage in good faith
20 settlement talks, from May 30, 2025 to **July 30, 2025**;

21
22 4. The last day for Defendants to provide full and complete expert disclosure,
from June 17, 2025 to **August 18, 2025**;

23
24 5. The last day to provide rebuttal expert disclosures, from July 29, 2025 to
25 **September 29, 2025**;

26
27 6. The last day for fact discovery, including disclosure of ESI and conclusion
of fact/lay depositions, from August 25, 2025 to **October 27, 2025**;

7. The last day to commence expert depositions, from September 16, 2025 to **November 17, 2025**;

8. The last day to file motions regarding the adequacy of discovery, from September 30, 2025 to **December 1, 2025**, and;

9. The last day to file dispositive motions, from November 28, 2025 to **January 28, 2026.**

RESPECTFULLY SUBMITTED this 27th day of May 2025.

MILLS + WOODS LAW, PLLC

By */s/ Sean A. Woods*

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CERTIFICATE OF SERVICE

I hereby certify that on May 27, 2025, I electronically transmitted the foregoing document to the Clerk's Office using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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/s/ Ben Dangerfield